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Kathy Baskin
Director of Water Policy
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA 02018

The Green Industry Alliance of Massachusetts is comprised of the Massachusetts Arborists Association (MAA), the New England Pest Management Association (NEPMA), the Massachusetts Association of Landscape Professionals (MLP), the Massachusetts Association of Lawn Care Professionals (MALCP), the Irrigation Association of New England (IANE), and the Golf Course Superintendents Association of New England (GCSANE). Our mission is to promote awareness and educate the public and elected officials in the Commonwealth on best practices and professional standards in structural and landscape, pest control and integrated pest management.

We are writing to express our collective concern with the proposed outdoor water use restrictions in Section V. and Table 7 of the Sustainable Water Management Initiative framework. We are concerned with the simplistic approach to limit outdoor water use and don't agree that limiting the number of days one can water their lawns and gardens makes sense. Further, this approach doesn't contemplate fluctuating weather, varying soil conditions, and other environmental variables nor does it recognize demand side controls that are used in virtually all modern irrigation and watering systems. We know that limiting watering to a number of days causes many to over water on the allotted days thinking they will make up for the days they are not allowed to water. However, this does nothing more than waste the water we are all trying to conserve and leads to unwanted runoff.

We are disappointed that the framework doesn't contemplate alternative solutions to manage the amount of water that is being used for lawns, gardens and landscapes. For example, a residence with an efficient irrigation system that is properly designed and maintained could use the same amount of water over several days or a week that the homeowner may use in one day if they are so limited. Why doesn't the framework consider any demand side controls? In addition, the framework doesn't take into consideration how to utilize alternative supplies for outdoor use like private wells, grey water and rain water harvesting.

We are gravely concerned about the economic impact such restrictions could have on the spectrum of green industry businesses. Restricting outdoor water use in such a way can have a drastic impact thousands of small businesses that make their living working outdoors. Landscape architects, designers, contractors, lawn care professionals, arborists, and many others can all be negatively impacted if an appropriate balance is not reached. These businesses contribute billions of dollars to the Massachusetts economy and help fill the coffers of the state and municipalities via sales taxes, payroll taxes, property taxes, unemployment insurance, workers compensation and fees too numerous to mention.

In conclusion, the Green Industry Alliance respectfully requests that the framework incorporate a broader perspective and seek to achieve a greater balance in their outdoor water use policy. The current approach is a simplistic answer to a complicated situation that involves many stakeholders. We urge the DEP to open these proceedings to a wider and more public audience and strive for balance through a transparent and cooperative process.

We appreciate the opportunity to comment, please do not hesitate to contact our legislative agent, Stephen A. Boksanski at Shanley Fleming Boksanski and Cahill (617-423-6600) with your comments and questions.